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18 *Attorneys for Defendants*
GIUSEPPE PENZATO and KESIA PENZATO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**STIPULATION FOR DEFENDANTS TO AMEND THEIR
ANSWER AND STIPULATED REQUEST AND
[PROPOSED] ORDER TO ENLARGE TIME FOR
PLAINTIFF TO RESPOND**

3:10-CV-05154-MEJ

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, and Federal Rule of Civil Procedure
2 15(a)(2), Plaintiff Jane Doe¹ (“Plaintiff”) and Defendants Giuseppe Penzato and Kesia Penzato
3 (“Defendants”), by and through their respective counsel of record, hereby stipulate that
4 Defendants may amend their Answer and hereby submit this stipulated request to enlarge time
5 for Plaintiff to file certain motions responsive to Defendants’ Answer:

6 WHEREAS Plaintiff filed her Complaint on November 12, 2010;

7 WHEREAS the parties previously stipulated that Defendants would have until March 29,
8 2011 to answer or respond to Plaintiff’s Complaint;

9 WHEREAS Defendants filed and served their Answer on March 29, 2011;

10 WHEREAS the parties previously stipulated and this Court ordered that Plaintiff would
11 have until April 29, 2011 to file any motions responsive to Defendants’ Answer previously due
12 on April 22, 2011;

13 WHEREAS the parties have agreed that Defendants shall amend Defendants’ Answer as
14 to certain affirmative defenses;

15 WHEREAS allowing an opportunity for Defendants to amend their Answer would
16 promote judicial efficiency;

17 WHEREAS allowing an additional week and a half for Plaintiff to file certain motions
18 responsive to Defendants’ Answer will not alter the date of any event or deadline already fixed
19 by this Court;

20 NOW, THEREFORE, the undersigned parties, through their respective counsel, hereby
21 stipulate and agree as follows:

22 1. Defendants shall file and serve an amended Answer to the Complaint by no later
23 than May 6, 2011; and

24
25 _____
26 ¹ The parties acknowledge that Defendants’ agreement to Plaintiff’s use of “Jane Doe” in this
27 filing in no way constitutes Defendants’ consent to Plaintiff proceeding under a pseudonym in
this litigation, nor have Defendants waived any argument that they may have to oppose
Plaintiff’s Motion for a Protective Order.

1 2. If Defendants fail to file and serve their amended Answer by May 6, 2011,
2 Plaintiff shall have until May 10, 2011 to file any motions responsive to Defendants' Answer
3 previously due on April 29, 2011.

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5 Dated: April 29, 2011

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7 By: s/ Matthew R. Reed
Matthew R. Reed

8 Attorneys for Plaintiff
JANE DOE

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11 BUCHALTER NEMER
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12 By: s/ Mia S. Blackler
Mia S. Blackler

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Attorneys for Defendants
GIUSEPPE PENZATO and KESIA
PENZATO

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: May 2, 2011



The Honorable Maria-Elena James
United States Magistrate Judge

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DECLARATION OF CONSENT

Pursuant to General Order 45, the undersigned certifies that concurrence in the filing of
this document was obtained from each of the other signatories.

5 || Dated: April 29, 2011

By: s/ Caroline Wilson
Caroline Wilson